

Exhibit E

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

In Re: Bard IVC Filters) MD-15-02641-PHX-DGC
Products Liability Litigation)
) Phoenix, Arizona
) May 18, 2018
)
Doris Jones, an individual,)
)
Plaintiff,)
) CV-16-00782-PHX-DGC
v.)
)
C.R. Bard, Inc., a New Jersey)
corporation; and Bard Peripheral)
Vascular, Inc., an Arizona)
corporation,)
)
Defendants.)

BEFORE: THE HONORABLE DAVID G. CAMPBELL, JUDGE

REPORTER'S TRANSCRIPT OF PROCEEDINGS

TRIAL DAY 4 - P.M. SESSION

(Pages 862 - 934)

Official Court Reporter:
Patricia Lyons, RMR, CRR
Sandra Day O'Connor U.S. Courthouse, Ste. 312
401 West Washington Street, SPC 41
Phoenix, Arizona 85003-2150
(602) 322-7257

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A P P E A R A N C E S

For Plaintiff:

Gallagher & Kennedy
By: **MARK S. O'CONNOR**, ESQ.
By: **PAUL L. STOLLER**, ESQ.
By: **SHANNON L. CLARK**, ESQ.
By: **C. LINCOLN COMBS**, ESQ.
2575 East Camelback Road, Suite 1100
Phoenix, AZ 85016

Lopez McHugh, LLP
By: **RAMON ROSSI LOPEZ**, ESQ.
100 Bayview Circle, Suite 5600
Newport Beach, CA 92660

Lopez McHugh, LLP
By: **JOSHUA MANKOFF**, ESQ.
214 Flynn Ave.
Moorestown, NJ 08057

Heaviside Reed Zaic
By: **JULIA REED ZAIC**, ESQ.
By: **LAURA E. SMITH**, ESQ.
312 Broadway, Ste. 203
Laguna Beach, CA 92651

For Defendants:

Nelson Mullins Riley & Scarborough
By: **RICHARD B. NORTH, JR.** ESQ.
By: **ELIZABETH C. HELM**, ESQ.
201 17th Street NW, Suite 1700
Atlanta, GA 30363

Nelson Mullins Riley & Scarborough.
BY: **JAMES F. ROGERS**, ESQ.
1320 Main St.
Columbia, SC 29201

Snell & Wilmer
By: **AMANDA C. SHERIDAN**, ESQ.
400 East Van Buren
Phoenix, AZ 85004

CROSS-EXAMINATION - BRET BAIRD

13:10:50 1 A To improve the reputation? No.

2 Q For marketing to have a purpose to improve the reputation
3 of the product.

4 A No. That's the role of marketing.

13:10:58 5 Q In any company anywhere?

6 A Any company anywhere, any industry.

7 Q That's what marketing's supposed to do; right?

8 A That's what we're supposed to do.

9 Q You were also asked a number of questions about changes to
13:11:12 10 the G2 for the Eclipse and then subsequent filters. Do you
11 recall that?

12 A Yes.

13 Q Okay. Before a product can go to market, before a filter
14 could go to market, what has to happen? Just generally what's
13:11:25 15 the big picture of what has to happen?

16 A It's very complex. Complex procedure. Typically you
17 start with an idea. We talked about idea POAs. The team
18 comes together and they discuss all sorts of things -- it's a
19 very complex system. So once you've identified an
13:11:42 20 opportunity, R&D works on it. There's potentially years of
21 testing. There's innovations that you can try to implement
22 onto the product or innovate, as we talked about, a brand-new
23 product, but there's a whole slew of activities. And once you
24 do that, you even have other team members who are involved in
13:12:00 25 it.

C E R T I F I C A T E

I, PATRICIA LYONS, do hereby certify that I am duly appointed and qualified to act as Official Court Reporter for the United States District Court for the District of Arizona.

I FURTHER CERTIFY that the foregoing pages constitute a full, true, and accurate transcript of all of that portion of the proceedings contained herein, had in the above-entitled cause on the date specified therein, and that said transcript was prepared under my direction and control, and to the best of my ability.

DATED at Phoenix, Arizona, this 18th day of May, 2018.

s/ Patricia Lyons, RMR, CRR
Official Court Reporter